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5 925 Fourth Avenue, Suite 2900  
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7 (206) 623-7580

Honorable Brian D. Lynch  
Chapter 13  
Hearing Location: Courtroom 1, 1717 Pacific  
Ave, Ste 2100, Tacoma, WA  
Hearing Date: Friday, June 12, 2019  
Hearing Time: 1:30 p.m.  
Response Date: June 5, 2019

8 UNITED STATES BANKRUPTCY COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 In re:

12 DIANE RENEE ERDMANN

13 Debtor.

Case No. 19-41238-BDL

DECLARATION OF DAVID C. NEU IN  
SUPPORT OF MOTION TO CONVERT CASE  
TO CHAPTER 7

14 David C. Neu declares as follows:

15 1. I am a partner with K&L Gates LLC, counsel for Mark Calvert, Chapter 11 Trustee  
16 for Northwest Territorial Mint, LLC ("NWTM") in Case No 16-11767-CMA, United States  
17 Bankruptcy Court for the Western District of Washington.

18 2. Attached hereto as Exhibit A is a copy of the judgment entered against the Debtor in  
19 Adv. Pro. 16-01217, United States Bankruptcy Court for the Western District of Washington.

20 3. Attached hereto as Exhibit B is a copy of the Declaration of Joseph Hamell in  
21 Support of Ex Parte Application for FRBP 2004 Examination of Renton Coin Shop filed at Dkt  
22 No. 1016, Case No. 16-11767-CMA.

23 4. Attached hereto as Exhibit C is a copy of documents produced pursuant to a subpoena  
24 to the Renton Coin Shop evidencing sales of metals.  
25  
26

DECLARATION OF DAVID C. NEU IN SUPPORT OF  
MOTION TO CONVERT.- 1

502235424 v1

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1           5.       Attached hereto as Exhibit D is a copy of documents produced pursuant to a subpoena  
2 to the Gold Center evidencing sales of metals.

3           6.       Attached hereto as Exhibit E is a copy of documents produced pursuant to a subpoena  
4 to Northgate Rare Coin evidencing sales of metals.

5           7.       Attached hereto as Exhibit F is a copy of documents produced pursuant to a Rule  
6 2004 subpoena to the Debtor, evidencing coin sales to the Pahrump Coin Shop.

7           8.       Attached hereto as Exhibit G are excerpts of a deposition transcript in which the  
8 Debtor admits to selling approximately \$700,000 worth of precious metal.

9           I declare under the penalty of perjury under the laws of the State of Washington that the  
10 foregoing is true and correct to the best of my knowledge.

11                   EXECUTED this 9<sup>th</sup> day of May, 2019, at Seattle, Washington.

12  
13  
14                   /s/ David C. Neu  
                      David C. Neu

**CERTIFICATE OF SERVICE**

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on May 9, 2019, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

Also on May 9, 2019, she caused the foregoing document to be placed in the mail to the Parties at the addresses listed below:

Diane Renee Erdmann  
PO Box 4024  
Federal Way, WA 98063

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 9th day of May, 2019 at Seattle, Washington.

/s/ Denise A. Lentz  
Denise A. Lentz